

Original

MICHEL, Antonio Candelario

FULL NAME

COMMITTED NAME (if different)

West Valley Detention Center

FULL ADDRESS INCLUDING NAME OF INSTITUTION

9500 Etiwanda Ave

Rancho Cucamonga, Ca 91739

PRISON NUMBER (if applicable)

1602370730 11d7

TO: pro se clerk

UNITED STATES DISTRICT COURT
Central District of California
312 NORTH SPRING STREET, ROOM G-8
LOS ANGELES, CALIFORNIA

FILED 90072
CLERK, U.S. DISTRICT COURT

APR 22 2016

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
DEPUTY

Michel, Antonio Candelario

CASE NUMBER

CV-16-00781-GW(RAO)

To be supplied by the Clerk

PLAINTIFF,

CIVIL RIGHTS COMPLAINT

PURSUANT TO (Check one)

☒ 42 U.S.C. § 1983

☐ Bivens v. Six Unknown Agents 403 U.S. 388 (1971)

San Bernardino County
Sheriff's Department
AND/OR MEDICAL STAFF

DEFENDANT(S).

A. PREVIOUS LAWSUITS

1. Have you brought any other lawsuits in a federal court while a prisoner: ☐ Yes ☒ No

2. If your answer to "1." is yes, how many? _____

Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on an attached piece of paper using the same outline.)

FILED
CLERK, U.S. DISTRICT COURT

APR 20 2016

BY

CLERK, U.S. DISTRICT COURT

DEPUTY

Lawsuit #①, For About three to Four years I've been taking my Mental Health Medications these include Cetera, Abilify, ZOLOFT, EFFEXOR, Ziprecsta, Resperdal, Haldol, and Welbutrin. Some were TAKEN AS A TEENAGER too! There seems to be a very serious problem Regarding my Current INTAKE OF Medication, They keep (The Nurses) TAKING ME OFF OF Welbutrin IN WHICH THEY DO NOT HAVE THE Authorization to do so. Only qualified Doctors are suppose to Take THEM OFF OR put THEM ON. IN Regards OF them TAKING ME OFF I've been Having Seizures IN WHICH I AM Transported to Kaiser Hospital or Arrowhead Regional Medical Center THE Doctors always prescribes the prescription of Welbutrin to Take orally THROUGH THE Mouth, TO ME THEM NOT giving (Nurses) my Medication is a Very serious ISSUE Regarding my Mental Health and physical Health there are several Government Codes Penal code §§ 3524 AND Government code §§ 844.6(a) and 845.6, Government Code §§ 844.6(a) and 814, WHICH STATES Failure to Summon Medical Care, when there is OR should be, Knowledge of, A Need, For Immediate Medical, my cellmate Robert Fontes is a witnesses to them denying my Medication. Also the

CIVIL RIGHTS COMPLAINT

CV-66 (7/97)

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witnessed some very serious seizures. As well as helped me through them. This is to me considered real negligence regarding my physical and psychological health. I was told by several doctors from Kaiser Hospital and Arrowhead Regional Medical Center that the West Valley Detention Center has no authorization (doctors, nurses), to stop giving them to me, because I was taking them when I was not in custody. I was getting prescriptions from the probation doctor DR. Halwick P.O.C. Also from Victor Valley Hospital, Arrowhead Regional Medical Center and Kaiser permanente Hospital. Recently I've been experiencing much pain in body and constant headaches, dizziness, numbness, anxious, racing thoughts. In other words mentally and physically being tortured here. So that is the reason for my filing this lawsuit. DR. MONTREAL, DR. BASHARN.

Lawsuit #2 Complaint I have been holding back this since 2013, information due to the fact that I'm in constant fear for my life and families life. The lawsuit is in reference to the fact that I was abused physically and tazed for kicks and ridiculed always in front of unit 11 inmates. For some reason I became a target and inmate that (Officer Techaya, R) made constant fun of! In 2013 he was fired for the constant fun tazing of inmates. He also created animosity between myself and Charles Williams and had us fight. I am still continually

Having thoughts about those incidents, He also stuck His Thumb up my Buttock AT Least a THUMB'S Length in which I Had to Try and get Him off OF Me, Cause He was provoking me to Anger to Hit Him, He told Me "What are you going to do about it Bitch," AND I Told Him "What are you some kind of Wierdo?" I Feel This Behavior was extremely unprofessional for a Sheriff Deputy. I am still going through a lot of Mental Stress and Trauma From all incidents THAT occurred Here at West Valley Detention Center to Me during the period of Incarceration. I Finally Felt that it's time to Come Forward with this Because Here at West Valley Detention Center there still exists the same abuse. I really want Justice to Be done on My Behalf. I Also Suffered Multiple Broken parts of my Face when He Made Me Fight Charles Williams who is Bigger than Me (6'4") and I'm only (5'7"). Anyhow, this is Factual Because of the write ups and Grievances that were documented. THANK You Very Much For Your time AND patience.

Inmate Antonio Michel
11d7 1602370730
W.V.D.C.,

P.S. You Can Sue on all the Grievances, documents that Have proof of these issues AT Hand on All claims!

9500 Etiwanda Ave
Rancho Cucamonga Ca
91739

#3 Complaint

also, I forgot to mention that I have a lower/lower Bunk/Bed chrono which means I'm supposed to be given a lower Bed instead of the top Bed Because the Cells Here at West Valley Detention Center are Double Bunk/Bed (Bunk Beds). Recently I was given Another Cellmate David Stivers to my Cell #5. In which They Moved me to the upper Bunk especially when they know I have the chrono for the lower Bed, This has Happened on several occasions, In which I've fallen off the Top Bunk due to seizures, I wear a yellow Band for Seizures. Several Times I've Had Several Bad Falls which gave me Bumps and Bruises on my Head in which They Had Taken Me to different Hospitals in the Area. Thank you! sincerely,

Antonio Michiel

11d7 #1602370730

W.V.D.C.

9500 ETIWANDA Ave

Rancho Cucamonga, Ca

91739



PRISON LAW OFFICE

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San Bernardino Case Update (November 2015)

Dear Sir or Madam:

The Prison Law Office is a non-profit law office representing adults and juveniles in California in cases about prison and jail conditions. Over the last several months, we have looked at conditions in the San Bernardino Jails. We found problems with medical care, mental health care, dental care, disability accommodations, use of force, and inmate-on-inmate violence.

We have been meeting with the Sheriff and County officials about the problems we found. We told them that they could agree to work with us to fix the problems, or we would file a class action lawsuit. The Sheriff and County officials have agreed to work with us to fix the problems we identified, and we are in the process of negotiating a written agreement to fix those problems. We have recently made good progress in these negotiations. However, if the County will not sign a written agreement that is acceptable to us, we will go to court about the problems. If the County signs the agreement, and then does not follow it, we will also go to court about the problems. We are hopeful that the problems will be fixed much faster through this process than if we spent several years in court fighting against the County. We are sending you an article from The Sun that explains a little bit more about the negotiations.

We are not representing inmates in a class action lawsuit about waist chains.

We are sorry that we do not have the resources to represent you in an individual lawsuit or to help you with your individual problem. We urge you to turn in a grievance to try to fix any problems you are having. To preserve your right to file a lawsuit in court in the future, you must turn in a grievance. Please be sure to keep copies of your grievances and any responses. Please also make sure you go through all three levels of the grievance process and receive a response from the Facility Commander.

We are also sorry that we do not know any attorneys who will take your individual case. If you would like self-help information about how to file a lawsuit on your own, please write back to us and ask for that information.

Sincerely,

Kelly Knapp

Encl: 10/13/14 News Article

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A prisoner rights nonprofit and San Bernardino County are working on an agreement to ensure inmates at the West Valley Detention Center in Rancho Cucamonga and other county jails are receiving adequate medical treatment and are not being abused by deputies.

"What we're concerned about is certain conditions in the jails such as health care, and we're also concerned about excessive use of force on prisoners by jail staff," said Donald Specter, executive director of the Prison Law Office in Berkeley, which provides free legal services to state prisoners and occasionally to parolees.

Last year, attorneys with the Prison Law Office filed a civil rights lawsuit against Riverside County, which was granted class-action status last month. The lawsuit alleges inadequate medical and mental health care in the county's five jails. A similar lawsuit was filed against Fresno County but was settled out of court.

Specter said he and attorneys from his office met with San Bernardino County Sheriff John McMahon and county Chief Executive Officer Greg Devereaux in late August at the West Valley Detention Center, which the FBI has been investigating since April after allegations surfaced that inmates were being physically assaulted and repeatedly stunned with Taser guns by deputies, according to inmates and lawsuits filed in federal court alleging civil rights violations against nearly a dozen inmates at the jail.

Three rookie deputies: Brock Teyechea, Andrew Cruz and Nicholas Oakley, were fired in the wake of the federal criminal investigation. They had all been out of the academy less than a year when the allegations surfaced.

"It's consistent with what we've been hearing," said Specter of the abuse allegations. "Dozens of prisoners have alleged they have been Tazed with little or no provocation,"

The two federal lawsuits have been stayed for six months so they don't interfere with the FBI investigation and so attorneys can negotiate settlements, according to online court records.

Advertisement

County CEO Greg Devereaux said the August meeting went well and everyone was "very cordial and respectful" on both sides.

"I think they were interested in seeing if we could work together to look at jail conditions and to see whether there were corrections or adjustments that needed to be made," Devereaux said. "I think the concerns they raised are ones that we too are concerned about, especially given the level of funding that we have in this county for mental health."

He said the county has been underfunded in the area of mental health since the 1991 realignment of the Health and Human Services system.

"We don't get as much per capita as other areas of the state, and we can certainly use more mental health funding in this county," Devereaux said.

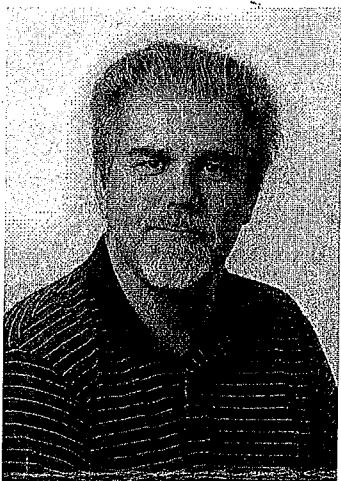
Specter said his office has interviewed more than 700 inmates from San Bernardino County, and more than 100 of them have complained of deputies using excessive force.

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According to inmate interviews and claims filed with the county, grievance forms are routinely denied when requested, or, deputies will threaten inmates with retribution if they ask for a grievance form.

Sheriff John McMahon couldn't be reached for comment Monday, but has stood by his deputies and the activities at the jail. He said he was unaware of any pattern of inmate abuse, and said the recent allegations are isolated to a few deputies. He touted the medical treatment of inmates as first rate during a tour of the jail in May.

Devereaux said County Counsel has been tasked with drafting a memorandum of understanding with the Prison Law Office and will eventually contact attorneys at the organization to discuss it.

"The next step is to see if we can negotiate an agreement that is acceptable to both of us on how to proceed," Devereaux said.



Joe Nelson

Joe Nelson covers San Bernardino County for The Sun, Daily Bulletin and Redlands Daily Facts. Reach the author at joe.nelson@langnews.com or follow Joe on Twitter: @sbcountynow.

- Full bio and more articles by Joe Nelson
- Back to top



SAN BERNARDINO COUNTY SHERIFF'S DEPARTMENT

HEALTH SERVICES REQUEST

- ☐ CDC
☐ GHRC
☐ HDDC
☒ WVDC
☐ Type I Jail

4/5/2016

Michel

Antonio

Calendario

DATE
(Fecha)LAST NAME
(Apellido)FIRST
(Primer Nombre)MIDDLE
(Segundo)1602370730
BOOKING NUMBER
(Numero De Prisionero)MAY 16, 1986
DATE OF BIRTH
(Fecha de nacimiento)1187
HOUSING LOCATION
(Unidad de vivienda)CHECK ONE BOX:
(Marque una)☐ MEDICAL
(Medico)☐ DENTAL
(Dental)☒ MENTAL HEALTH
(Sanidad Mental)PROBLEM:
(Problema)

I've been asking on numerous occasions especially after
recently having alot of seizures and have been prescribed by
Kaiser Hospital & Arrowhead Regional Hospital Doctors my
Medication of Wellbutrin I've also Submitted a Grievance on this
issue AND will be filing a Mental Health lawsuit if not issued my

ALLERGIES: Medication you don't understand that without them I have
(Alergias) Seizures.

WHEN WAS YOUR LAST VISIT TO THE JAIL NURSE OR DOCTOR?

(¿Cuándo fue la última visita con el doctor o enfermera?)

WHEN IS YOUR NEXT COURT DATE?

(¿Cuándo es la próxima fecha que vas a corte?)

THERE WILL BE A CO-PAY FEE OF \$3.00 FOR INMATE-INITIATED, NON-EMERGENCY HEALTH CARE SERVICES PROVIDED. CERTAIN HEALTH CARE SERVICES ARE EXEMPT FROM THE FEE.

(HAY UN CARGO DE TRES DOLARES POR SERVICIOS MEDICOS SOLICITADOS POR PRISIONERO QUE NO SEAN CASOS DE EMERGENCIA. CIERTOS SERVICIOS DE CUIDADO DE SALUD SON EXCLUIDOS DEL CARGO.)

Inmate's Signature:

(Firma)

MEDICAL STAFF RESPONSE

RN/MD S/C (DATE):

Dental/Mental Health Referral ☐

Date

Time

Health Care Provider

Distribution:

White/Yellow - Medical Staff

Pink - Inmate

**SAN BERNARDINO COUNTY SHERIFF'S DEPARTMENT
DETENTION AND CORRECTIONS BUREAU**



☒ INITIAL INMATE GRIEVANCE
☐ GRIEVANCE APPEAL

☐ CDC
☐ GHRC
☐ HDDC
☒ WVDC
☐ Type I
☐ Work Release

Inmate's Name Antonio Condelario Michel Booking # 1602370730
Housing Location 11 d 7 Date of Complaint on going / present
Date of Incident on going / present Time of Incident on going / present Location of Incident unit 11 d 7

EXPLAIN YOUR COMPLAINT (include dates, times and names of persons involved) You have 10 days from the day the incident occurred to submit your grievance. You do not have a time limit if the grievance is used to report a sexual assault. If this grievance is related to a disability check this box: ☐

My complaint is due to NOT receiving my Medication
2 Welbutrins a day. Arrowhead Medical Center and
Kaiser both prescribed my Welbutrin, without them
I have Seizures! on the 21th I Had 2 Very Bad
Seizures then I was taken to Kaiser, in which the
Doctor told me and promised I would be issued my
Medication I've been taking them for years and I
know what works for me. Mentally and physically
if needed I will have my family and my Doctor on
the street call down here to straighten out this.
p.s. Government Code §§ 844.6(a) and 845.6. which state
Failure to summon and administer proper Medical and Mental care
when in need or should be knowledge of immediate care.
THANK YOU! For your time and patience, all I want is my
Medication which will help me stop my seizures!

Inmate Signature [Signature]

Date 3-30-16

DO NOT WRITE BELOW THIS LINE - STAFF USE ONLY

You have 20 days from the date indicated below to complete the grievance investigation and return it to the inmate.

Received By I. ARCE

Employee's Name (please print)

Date 3-30-16

Time 1231

Grievance # _____

Date _____

Assigned to _____

- a. Parties to this previous lawsuit:
Plaintiff Antonio Candenario Michel
- Defendants SAN Bernardino County Sheriffs Department AND/OR Medical STAFF AND/OR Mental Health Doctors.
- b. Court _____
- c. Docket or case number _____
- d. Name of judge to whom case was assigned _____
- e. Disposition (For example: Was the case dismissed? If so, what was the basis for dismissal? Was it appealed? Is it still pending?) _____
- f. Issues raised: Medical Mental Health Negligence AND physical AND Mental Abuse By Sheriffs deputies, Doctors and Nurses
- g. Approximate date of filing lawsuit: April 13TH, 2016 4/13/2016
- h. Approximate date of disposition _____

B. EXHAUSTION OF ADMINISTRATIVE REMEDIES

1. Is there a grievance procedure available at the institution where the events relating to your current complaint occurred? ☒ Yes ☐ No
2. Have you filed a grievance concerning the facts relating to your current complaint? ☒ Yes ☐ No

If your answer is no, explain why not _____

3. Is the grievance procedure completed? ☐ Yes ☒ No

If your answer is no, explain why not THEY Keep giving me the Run Around AND Tell me some of my grievances Had NOT Been Received BUT I Keep Telling them to ALSO Look at THE Medical and Mental Health Documents.

4. Please attach copies of papers related to the grievance procedure. Health Documents.

C. JURISDICTION

This complaint alleges that the civil rights of plaintiff

Antonio Candenario Michel 1167
(print plaintiff's name) #1602370730
West Valley Detention Center, 9500 Etiwanda Ave, Rancho Cucamonga, Ca 91739.
who presently resides at (mailing address or place of confinement)

were violated by the actions of the defendant(s) named below, which actions were directed against plaintiff at
West Valley Detention Center, San Bernardino County Sheriffs Department, Deputies Medical/Mental STAFF, Doctors, Nurses.
(institution/city where violation occurred)

CIVIL RIGHTS COMPLAINT

on (date or dates) Year 2013 to present (Claim I) Year 2013^{TO} present (Claim II) Year 2013 to present (Claim III)

NOTE: You need not name more than one defendant or allege more than one claim. If you are naming more than five (5) defendants, make a copy of this page to provide the information for additional defendants.

1. Defendant San Bernardino County Sheriff's Department AND John Mc Mahon (full name of first defendant) resides or works at

West Valley Detention Center 9500 Etiwanda Ave, Rancho Cucamonga, Ca 91739 (full address of first defendant)

Sheriff Deputies OF W.V.D.C. AND Commander in Chief John Mc Mahon (defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law: THE SHERIFF DEPUTIES ARE CONSTANTLY Ignoring My Complaints AND NOT Helping Me with My ATTENTION AND Need OF Medical/Mental Treatment AND ARE Constantly Abusing Me Mentally Cause OF MY Condition AND slow speech which violates MY CIVIL RIGHTS

2. Defendant SHERIFF Department OF W.V.D.C. DOCTORS + NURSES + STAFF (full name of first defendant) resides or works at psych Techs

West Valley Detention Center 9500 Etiwanda Ave, Rancho Cucamonga, Ca 91739 (full address of first defendant)

DR. Barshan (INDIA) + Nurses + STAFF OF Medical AND Mental Clinic (defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law: THE Doctor + Psych Techs + Nurses AND Medical/Mental STAFF ARE Violating My Civil Rights By NOT giving me ATTENTION TO Immediate Medical/Mental Care AND Treatment THEY JUST Ignore My Complaints and grievances AND NEVER Realize How Serious My Condition is Cause OF Seizures

3. Defendant DR Barshan, Sheriff's dept OF San Bernardino County Medical + Mental STAFF (full name of first defendant) resides or works at

West Valley Detention Center, 9500 Etiwanda Ave, Rancho Cucamonga, Ca 91739 (full address of first defendant)

DR Barshan/Mental Health Doctor; Plus Psych Techs + Nurses + STAFF (defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law: THE Above Mentioned people are always Neglecting to give Me My Medication (Wellbutrin 2x150xLS a day) For Me TO Function BOTH Mentally AND physically on A DAILY Basis, I also Complained to Him THAT THIS IS WHAT IS Causing My Seizures AND They all Ignored My Complaints AND Grievances.

4. Defendant DR. Montrie FT / San Bernardino County Sheriff's Dept Medical resides or works at W.V.D.C. 9500 STEWANDA AVE, Rancho Cucamonga, Ca 91739, Mental Health Clinic
(full name of first defendant)
DR. MONTRIE FT OF Medical/Mental Health + Sheriff Dept AND
(full address of first defendant)
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law: DR Montrie FT AND Sheriff Dept AND
the Clinic were Not giving Me My Medication Welbutrin 2x150 XLS A day
which Violates my Civil Rights For Immediate Need of Treatment
which Causes my Serazores

5. Defendant Deputy Techeya R AND Sheriff Deputies resides or works at Incident
(full name of first defendant) He got Fired in 2013 For all the Mentioned
West Valley Detention Center 9500 STEWANDA AVE, Rancho Cucamonga, Ca 91739
(full address of first defendant)
Sheriff Deputies
(defendant's position and title, if any)

The defendant is sued in his/her (Check one or both): ☒ individual ☒ official capacity.

Explain how this defendant was acting under color of law: Deputy R. Techeya AND other
deputies were AND still are Always picking on Me and doing things
THAT were Unprofessional and Malicious, He Made Me Fight
Another Inmate. He Also shoved His Thumb up My Buttock,
He Also Tazed Me AND peppered sprayed Me For Fun. There
are Also Several witnesses to these Events, and Have Been
in Fear For My Life since 2013. They were always using
excessive Force ON Me and giving Me Write ups THAT
are Made up AND Ignoring My Complaints

D. CLAIMS*

CLAIM I

The following civil right has been violated:

My Right to Have Immediate Medical Care AND Mental Health Treatment
IN which is needed For Me to Function on A Daily Basis BOTH physically AND
Mentally, TO ME THEM NOT THEM giving it is A FORM OF Torture TO MY MIND
AND Body. It Also Violates my Civil Rights Being "Cruel and Unusual punishment."
AND is a FORM OF Medical/Mental Illness Negligence. Its Basically
A LACK OF Care and Treatment which Amounts to "Deliberate
Indifference" TO a Serious Medical AND Mental Illness Need.
THE DOCTORS, Deputies, Nurses ETC... Should Already Know THAT
THIS IS Serious THEY Always Ignored my Complaints AND Needed
Treatment when Having Seizures knowing I need the Medication.
THERES BEEN Several deaths Here Regarding Thier Negligence, which
always puts me in the Same Category Due to my Condition.

Supporting Facts: Include all facts you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be certain you describe, in separately numbered paragraphs, exactly what each

DEFENDANT (by name) did to violate your right. these are all my Mental Illness Doctors & Medical

- (A) DR. Mowtriet continuously denied Me my Medication Welbutrin 2x150^{mg} a day
IN which it is painful NOT TO HAVE THEM Mentally AND physically, which Violates
TO Have proper Care and Treatment in which gave me and still does
Seizures, THE Seizures are Very serious which Can Lead to death, I Always
get Bruises, Bumps, sometimes Fractures All over My Body. I Also ASK For Several
Copies OF Medical Documents AND X-RAYS to send you Copies BUT THEY Ignore my Requests
- (B) DR. BARSHAN (INDIA) Also Has Been Neglecting to give Me My Medication AND Does NOT
ADhere to the Doctors prescriptions From Kaiser Hospital AND Arrowhead Regional Medical
Center THIS Violates My Right to Have Treatment, AND proper Medical & Mental Health
Treatment. He Also Along with THE rest OF THE Medical/Mental Illness STAFF
Denies me getting Copies OF Records AND X-RAYS, Especially THE Requests,
Complaints AND Grievances, THIS Violates my Right.
- (C) DR. Halwick OF probation Outpatient Clinic (P.O.C.) Knows that I Need
THIS Medication to Function He prescribes Me the proper dosage From Keeping
Me From Having Seizures, I sent a Letter so He CAN send THE Doctors
Copies TO Let them know THAT I Need THE Medication, I Feel they Are
Keeping My Mail From Me or NOT Sending it out.

*If there is more than one claim, describe the additional claim(s) on another attached piece of paper using the same outline.

D. Claims

Claim #2

The following Civil Right Has Been Violated: The Right to Have protection From Excessive Force, Tazering For Fun, unproper Body Search (Sexual Misconduct by Deputy R. Techeya, His Thumb) also pepper Sprayed For Know Reason (For Fun), Slammed me into Dirty Water Shower, Made Fun of Me Cause of My Medical and Mental Illnesses. He also Tased Me For Fun, I Feel this Violates my Civil Right which is "Cruel and Unusual punishment." I also Put several grievences and Complaints. Techeya R, (Deputy) was Fired Along with other deputies For this Misconduct.

* Supporting Facts: Include all Facts you Consider important, state the Facts clearly, in your own words, AND without citing Legal Authority or Argument. Be Certain to describe, in Separately Numbered paragraphs, Exactly what each defendant (by name) did to Violate your right: Deputy R. Techeya and His partner deputy Made me prone down on the ground and Handcuffed my Legs and Hands like a Hog in chains, AND picked me up AND slammed Me into Dirty shower Water which was prior to them pepper spraying Me For Know Reason (Fun + Ridicule Cause of My Mental Condition AND slow speech). Also on Another occasion He Made me pass out Chow/Food (serve Food AS a Chow server) with other Inmates Mental problems Made Fun of us AND Tazed us For Fun. He also stuck His Thumb up my Buttocks while patting Me down and Told Me "what are you going to do about this Bitch" AT THUMB'S Length, I told Him "what are you some Kind of Wierdo?" He also Made Me Fright Another Inmate Black Male 6'4" AND myself 5'7" Hispanic/white while Having several Medical/Mental Illnesses AND given Medication. I suffered Faces Fractures. Everything is documented in Records.

D. Claims

CLAIM #3

*

THE Following Civil Right Has been Violated: THE Deputies Had Violated my Right to Be on a Lower Bunk in which I Have a Medical Chrono THAT states I should Be on a Lower Bunk due to my Continuous Seizures, I wear a (yellow Band) on My wrists For Seizures, they deliberately did this by putting Me on a Top Bunk in which I Fell OFF on several occasions, THIS is Cruel and Unusual punishment Because of THE Fracture Bruises, AND Bumps, they Ignored My Complaints AND Grievances. In other words proper Medical/Mental Illness Care.

* Supporting Facts: Deputy R. Techeya and other deputies use unprofessionalism By deliberately putting Me on a upper Bunk when they knowingly know that I Have Seizures AND Have a Medical/Mental chrono AND yellow seizure Band, THAT Requires Me to be on a Lower Bunk, THIS is really Cruel and unusual punishment, especially when they do it For no reason AND when I Have Seizures, Fall OFF AND Obtain Bruises, Bumps AND Sometimes Fractures all over My Body. Everything is documented on Records.

E. REQUEST FOR RELIEF

I believe that I am entitled to the following specific relief:

I Believe my Mental Anguish AND damage to my Body, Regarding my Medical and Mental Illnesses, use of excessive force, Being Violated, Ridiculed, Beat up, Deliberate punishment For Fun AND Kicks. Just Because of my Medical/Mental Illnesses AND slow speech I FEEL I AM ENTITLED to the Relief OF \$2,000,000 ⁰⁰⁰ TWO Million Dollars For the Negligence OF THE DOCTORS, NURSES, AND Deputies. I ALSO Believe I AM ENTITLED to the Relief OF \$1,000,000 ONE-Million Dollars For the cruel AND Unusual punishment AND For THE THOUGHTS that will Remain a LIFETIME (Mental Anguish) which also includes Bruises, Bumps, Fractures, Medical Expenses, Mental Illness expenses, Medications, Reconstructive Surgery, on Nose AND Face, Plus For personal Care and Treatment From the Following Hospitals, Kaiser permanente, Arrowhead Regional Medical Center, Victor Valley Hospital, AND personal Doctors, AND X-RAYS. I THANK you For your Time AND patience Dear Honorable U.S. District Judge and Dear Honorable U.S. Federal Magistrate Judge OF THE COURT OF CALIFORNIA

4/13/2016

(Date)



(Signature of Plaintiff)